

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ADREA, LLC,

Plaintiff,

- against -

BARNES & NOBLE, INC.,
BARNESANDNOBLE.COM LLC, and
NOOK MEDIA LLC,

Defendants.

13-CV-4137 (JSR)

ECF Case

JURY TRIAL DEMANDED

DEFENDANTS' PROPOSED VOIR DIRE REQUESTS

Pursuant to Rule 8 of the Individual Rules of Practice of the Honorable Jed S. Rakoff, Defendants Barnes & Noble, Inc., barnesandnoble.com llc, and NOOK Media LLC respectfully submit the following proposed *voir dire* requests:

Proposed Introduction: This case involves a dispute over three patents. The plaintiff, Adrea, has sued Barnes & Noble, claiming that certain devices sold by Barnes & Noble that can be used to read electronic books, also called by their brand name, the NOOK, infringe Adrea's patents. Barnes & Noble, the defendant, denies that its the NOOKs infringe Adrea's patents and says that the patents are invalid and should not have been granted by the United States Patent and Trademark Office in the first place.

1. Have you ever applied for or received a patent, trademark or copyright? How about a member of your family or someone close to you?

2. Have you ever been involved in a dispute over a patent, trademark, or copyright? How about a member of your family or someone close to you?
3. As will be explained, a jury can decide based on the evidence they hear at trial that a patent issued by the Patent and Trademark Office is in fact invalid and should not have been issued. Some people think that is fine and others are reluctant to undo something the Government or the Patent Office has already done. What are your thoughts?
4. Have you ever sued someone or been sued by someone?
5. Please tell us what county and what town or neighborhood you live in.
6. What is the last grade of school, including college or graduate school, which you finished?
7. If you have an undergraduate or graduate degree, what is it in?
8. Where do you work and what do you do? How long have you worked there? If you are retired, what did you do at your most recent job?
9. Please tell us what other adults who live with you do for their work.
10. Have you ever served as a juror before? What kind of case? Did you reach a verdict? Were you the foreperson of the jury?
11. Please list any newspapers or magazines you read regularly, radio talk shows you listen to regularly, and favorite TV programs.
12. How do you primarily get your news? Through a newspaper, the internet, on television, on radio, or through some other means? Will you be able to abide by my instructions to avoid reading or watching any news accounts of this matter, and to not do any research or investigation, including any online searching or investigation, about this matter?
13. How often do you use a computer at work or at home?

14. Have you ever read an electronic book, or used a device like the NOOK or Kindle?

15. Is there any reason besides what you may already have said that you think we should know when considering your qualifications to serve as a juror in this case?

Dated: New York, New York
October 2, 2014

Respectfully submitted,

Arnold & Porter LLP

/s/ Yue-Han Chow

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CERTIFICATE OF SERVICE

I, hereby certify that on October 2, 2014, copies of the foregoing were caused to be served upon the following via ECF:

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/s/ Yue-Han Chow

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